## Exhibit A

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re:	)
W.R. GRACE & CO., et al.,	) ) Bankruptcy Case No. 01-01139 (KG)
Reorganized Debtors.	) ) Docket No. 32999
Continental Casualty Company, et al.,	) ) )
Plaintiffs,	) )
v.	Adv. Pro No. 15-50766 (KJC)
Jeremy B. Carr, et al.,	, ) )
Defendants.	, ) )
Barbara Hunt, Personal Representative for the Estate of Robert J. Hunt, deceased and Sue C. O'Neill,	) ) )
Plaintiffs,	, )
v.	) Adv. Pro. No. 18-50402 (KJC)
Maryland Casualty Company,	) )
Defendant.	) )

## PROPOSED SCHEDULING ORDER PURSUANT TO L.R. 7016-1(b)

The Court, having considered the Status Report filed by the Plaintiffs advising the Court that the Plaintiffs and the Defendants have agreed on a proposed briefing schedule, and the Court having considered the positions of the parties, and good cause having been shown;

IT IS on this \_\_\_\_\_ of October 2018,

## **ORDERED THAT:**

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1. Continental Casualty Company and Transportation Insurance Company

(collectively, CNA) and Maryland Casualty Company (MCC) will file and serve opening

memoranda addressing the two questions raised by the Third Circuit's remand decision on or

before December 7, 2018.

2. The Defendants are to file and serve an opposition memorandum on or before

January 21, 2019. At that time, the Defendants may also move for certification of one or more

issues to the Montana Supreme Court.

3. CNA and MCC will file and serve reply memoranda on the remand issues and

opposition memoranda as to any motion for certification by the Defendants within thirty (30)

days after electronic service of the Defendants' opposition memorandum and/or motion for

certification.

4. The Defendants will file and serve a reply memorandum relating only to the

motion for certification within thirty (30) days after electronic service of the CNA/MCC

memoranda opposing certification.

5. All dates set forth herein are established with the assistance and knowledge of the

Parties. The Parties may agree by stipulation entered in the docket to extend any of the deadlines

set forth above.

6. The Court will set the matter for oral argument after briefing is completed.

KEVIN J. CAREY

U.S. Bankruptcy Judge

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